11719

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ARNOLD JACKSON, 07 CV 3320 (SHS)

Plaintiff,

-against-**NOTICE OF MOTION**

WATERMAN STEAMSHIP CORP.,

Defendant.

Defendant, Waterman Steamship Corp. **MOTION BY:**

PLACE, DATE & Before the Honorable Sidney H. Stein, United States

TIME OF MOTION: District Judge, at the Daniel Patrick Moynihan United States

Courthouse, 500 Pearl Street, Courtroom 23A, New York, NY

10007, on a date and time to be assigned by the Court.

SUPPORTING PAPERS:

Declaration of Lisa G. Johnston, dated July 25, 2007, with 1.

exhibits annexed; and

Memorandum of Law in Support of Defendant's Motion to 2.

Transfer Venue to the Eastern District of Louisiana.

An Order, pursuant to 28 U.S.C. § 1404 (a), transferring venue of RELIEF **REQUESTED:** this action to the U.S. District Court for the Eastern District of

Louisiana, for the convenience of the parties and witnesses, and in

the interest of justice.

OPPOSING Opposition papers are to be filed by August 10 2007. See Case

Management Plan dated June 15, 2007, and L. Civ. R. 6.1 (b). **PAPERS:**

REPLY Reply papers, if any, will be filed by August 17, 2007. See Case

Management Plan dated June 15, 2007, and L. Civ. R. 6.1 (b). **PAPERS:**

ORAL

If requested by the Court. **ARGUMENT:**

Dated in the City of New York on July 27, 2007

Respectfully submitted,

JUNGE & MELE, LLP Attorneys for Defendant

/s/ Peter A. Junge

By:

Peter A. Junge (PJ-0745) 29 Broadway – 9th Floor New York, NY 10006 (212) 269-0061

Of Counsel,
Glenn G. Goodier (La. Bar #6130)
Lance M. Sannino (La. Bar #29409)
JONES, WALKER, WAECHTER,
POITEVENT CARRIÈRE & DENÈGRE, LLP
201 St. Charles Avenue – 48th Floor
New Orleans, LA 70170-5100
(504) 582-8000

TO: Paul T. Hofmann, Esq.
HOFMANN & ASSOCIATES
Attorneys for Plaintiff
360 West 31st Street
New York, NY 10001
(212) 465-8840